
Appendix A

Analysis of Scoping Comments

Pre-Commercial Thinning Project – Forestwide

Three letters specific to the project were received during the scoping period of March 24, 2017 to April 24, 2017 (but see below). The disposition of the comments are found in the Table below. The original comment letters are available in the project record.

The letter from the Lewis & Clark ATV Club, though submitted during the scoping period, was submitted incorrectly. The scoping letter (dated May 27, 2017) specifically states that comment letters are to be submitted to the FS-comments-northern-nezperce inbox; the ATV Club's letter was submitted to the FS-comments-northern-nezperce-redriver inbox. The ATV Club's letter was not discovered until after the Pre-commercial Thinning – Forestwide project decision was signed. The comments have been included in the project record.

Table: Comment Analysis

Commenter	Comment	Disposition
Friends of the Clearwater, Gary Macfarlane	The scoping letter maps don't always correspond with areas that have been logged "in the last 15 to 25 years".	See responses to the comment (pp. 3 – 6) for each Ranger District.
	The scoping letter and maps indicate that thinning would occur within RHCAs, which is not consistent with PACFISH direction.	See responses to the comment (pp. 3 – 6) for each Ranger District.
	The Forest Service should prepare an EIS because the PCT will have significant effects on the environment.	The proposed activities will be analyzed to determine whether extraordinary circumstances related to the proposed action warrant further analysis and documentation in an EA or an EIS.
	PCT could have significant cumulative impacts.	Effects of the proposed activities will be analyzed and cumulative effects discussed in the Decision.
	"Salvage or thinning operations that remove dead or decayed trees or coarse woody debris on the ground will reduce the availability of forest structures used by fishers and lynx." (Bull et al., 2001.) Since this is a thinning project the impacts on lynx and lynx habitat must especially be considered.	Effects to lynx and lynx habitat will be analyzed and discussed in the Decision. Proposed treatment areas (stands and parts of stands) that fell within modeled suitable lynx habitat were removed from the proposal prior to scoping.

Commenter	Comment	Disposition
Friends of the Clearwater, Gary Macfarlane	Thinning activities may affect old-growth stands and old-growth-dependent wildlife habitat.	Project activities would not occur in old growth habitat.
	PCT activities may introduce noxious weeds to the project area.	<p>BMPs for weed management would be followed. All work would be done by hand using chainsaws. The following design criteria address the introduction of noxious weeds from equipment/vehicles:</p> <ul style="list-style-type: none"> • Mechanical timber harvest equipment would not be used for thinning activities. • Motorized equipment (such as ATVs) would not be permitted off designated roads in the treatment areas.
	PCT may affect fisheries habitat and watershed resources.	<p>The project would comply with all applicable State and Federal water quality laws.</p> <p>Effects on fisheries and water resources will be analyzed and discussed in the Decision.</p> <p>Compliance with Forest Plan standards, including those for fish habitat and water quality, are required for all projects.</p>
	Proposed BMPs may not prevent sediment from reaching streams in or near the project area.	<p>Pre-commercial thinning done by hand using chainsaws would result in minimal, if any, soil disturbance. The following design criteria reduce the potential for sediment production:</p> <ul style="list-style-type: none"> • No roads or landings would be constructed. • Mechanical timber harvest equipment would not be used for thinning activities. • Motorized equipment (such as ATVs) would not be permitted off designated roads in the treatment areas.

Commenter	Comment	Disposition
Friends of the Clearwater, Gary Mcfarlane	PCT may have cumulative effects on TES fish species.	Effects to TES fish species will be analyzed and cumulative effects discussed in the Decision.
	PCT may have cumulative effects on soil productivity.	Effects to soil productivity will be analyzed and cumulative effects discussed in the Decision.
	Please utilize the NEPA process to clarify any roadless boundary issues.	Project activities would not occur in any roadless areas identified in the 2008 Idaho Roadless Rule.
	The maps include inaccurate or incomplete information, and are hard to read.	Thank you for your comment. The oversights and readability will be corrected in future maps.
	<p>Lochsa-Powell RD</p> <ul style="list-style-type: none"> • Map 1's two most northerly units appear to be within the RHCA and shouldn't be there. • Map 4's southernmost unit near Brick Creek (section 28) appears to be in the RHCA and shouldn't be there. • Map 5's unit in sections 8 and 17 appears to be in the RHCA and shouldn't be there. • Map 6's northern most unit in sec. 9 appears to be in the RHCA and shouldn't be there. Also, the southern unit is very close to the river corridor and should be dropped. • Map 7's unit in sections 4 appears to be in the RHCA and shouldn't be there. Units in sec 9 and 15 may be within RHCAs. • Map 8's two units in sections 30 and 20/21 appear to be in the RHCA and shouldn't be there. • Two units in section 1 appear to be in the RHCA and shouldn't be there. • Several units in Badger and Wendover Creeks appear to be in the RHCA and shouldn't be there. • Map 14 contains several units in Parachute and Imnamatnoon Creeks appear to be in the RHCA and shouldn't be there. • Also the unit in the south part of section 17 [Map 3] crosses Eldorado Creek and shouldn't be there. 	<p>The maps in the scoping letter show the entire stand, including any overlap with an RHCA buffer, if present. This was a mapping error which will corrected on future maps.</p> <p>Per the Design Criteria in the scoping letter:</p> <ul style="list-style-type: none"> • Felling of trees would not occur within 25 feet of perennial streams. • Trees providing shade within 50 feet of any perennial stream would not be cut. • A Fisheries Biologist would evaluate the stands proposed for thinning to determine what, if any, streams need additional protection.

Commenter	Comment	Disposition
Friends of the Clearwater, Gary Macfarlane	<p>Lochsa-Powell RD</p> <ul style="list-style-type: none"> Map 3 contains units within the official boundary of the [Nez Perce/Lolo National] Historic Trail. The units within sections 8, 9, 10, 16 and 17 should be removed from the project. Map 9 contains units within the official boundary of the Historic Trail. The two units in the northwest of the map should be dropped. Map 10 contains at least one unit that appears to be within the official boundary of the Historic Trail. Two near Stomach Camp should be dropped. Map 14 contains several units that appear to be within the official boundary of the Historic Trail on Wendover Ridge and should be dropped. 	<p>Nine stands (145 acres) proposed for thinning on the Lochsa-Powell Ranger District will be dropped from treatment. Additional analysis showed the stands to be within the Nez Perce/Lolo National Historic Trail boundary.</p> <p>Two stands proposed for treatment will be modified as follows: the portions of the stands (67 acres) that overlap with the Historic Trail boundary will be removed from pre-commercial thinning. The remainder of the stands (38 acres) would be thinned.</p>
	<p>Moose Creek RD</p> <ul style="list-style-type: none"> The northern most unit [in Map 1] appears to be in the RHCA and it shouldn't be there. The units in sections 25 and 36 [Map 3] appear to be in the RHCA and they shouldn't be there. 	<p>The maps in the scoping letter showed the entire stand including overlap with an RHCA buffer, if present. This was a mapping error that will be corrected on future maps.</p> <p>Per the Fishery Biologist's assessment, eight of the nine stands proposed for thinning in the Moose Creek project area would not require an RHCA Buffer, either due to a buffer not being needed, or the stand's edge already being buffered. The Fishery Biologist recommended a 20-foot buffer where the RHCA is present in stand 01170713010004 as shown on Map 3, Sections 35/36.</p> <p>In addition, per the Design Criteria, felling of trees would not occur within 25 feet of perennial streams, and trees providing shade within 50 feet of any perennial stream would not be cut (Scoping Letter, March 2017, p. 25).</p>

Commenter	Comment	Disposition
Friends of the Clearwater, Gary Macfarlane	<p>Moose Creek RD</p> <ul style="list-style-type: none"> [The units in Maps 1, 2, and 3] are all within the Johnson Bar Project Area. If this was indeed important, why was it not identified in the Johnson Bar Salvage Sale EIS? 	See Response below.
	<p>North Fork RD</p> <ul style="list-style-type: none"> Map 2's units along French, Jenson and Rescue Creeks appear to be in the RHCA and they shouldn't be there. Map 6's western unit in section 36 appears to be in the RHCA and it shouldn't be there. Map 9's two units in sections 15 and 16 appear to be in the RHCA and shouldn't be there. 	None of the stands proposed for thinning in the North Fork Ranger District would be in an RHCA.
	<p>North Fork RD</p> <ul style="list-style-type: none"> Map 10's unit on Skull Creek isn't likely to be a site for future timber projection [sic] given the remoteness and steepness of the terrain. 	The project's objective is to reduce stand density to improve the overall health, structure and vigor of the stand. Factors such as remoteness and slope will be considered for any potential future timber activities in the stand.
	<p>Palouse RD</p> <ul style="list-style-type: none"> Map 1's big unit in section 15 appears to be in the RHCA and it shouldn't be there. Map 2's units in sections 4 and 10 appear to be in the RHCA and they shouldn't be there. Map 4's unit in section 36 appears to be in the RHCA and it shouldn't be there. Map 5's unit in section 27 appears to be in the RHCA and it shouldn't be there. Map 6's unit in section 33 appears to be in the RHCA and it shouldn't be there. Map 7's unit in section 6 appears to be in the RHCA and it shouldn't be there. Map 10's eastern unit in section 21 appears to be in the RHCA and it shouldn't be there. 	None of the stands proposed for thinning in the Palouse Ranger District would be in an RHCA.
	<p>Red River RD</p> <ul style="list-style-type: none"> PCT in roadless areas will affect roadless characteristics. 	Project activities would not occur within any roadless areas identified in the 2008 Idaho Roadless Rule.
	<p>Red River RD</p> <ul style="list-style-type: none"> The units are mainly lodgepole pine. Thinning them makes little sense. 	The project's objectives of reducing stand density to improve its overall health, structure and vigor includes thinning of lodgepole pine stands.

Commenter	Comment	Disposition
Friends of the Clearwater, Gary Macfarlane	Red River RD <ul style="list-style-type: none"> Unit 1 [in Map 3] : the agency has improperly located the old cutting unit, which is east of the former cutting unit. Unit 1 must be dropped. 	The Red River Mile 1 unit was incorrectly included for this project. The stand will be dropped from thinning in the Decision.
	Red River RD <ul style="list-style-type: none"> Tenmile Creek is an access to the Gospel-Hump Wilderness and cutting along the Creek would violate the reasons for this proposal. 	
	Salmon River RD <ul style="list-style-type: none"> Map 3's northernmost unit appears to be in the RHCA and it shouldn't be there. 	None of the stands proposed for thinning in the Salmon River Ranger District would be in an RHCA.
	Salmon River RD <ul style="list-style-type: none"> [Map 3's northernmost unit] is in the Little Slate Roadless Area and is not a former cutting unit. The unit should be dropped. 	Project activities would not occur within any roadless areas identified in the 2008 Idaho Roadless Rule. Stand 0318010003 (Little Boulder #14) was harvested in 1990, prescribed burned for site prep in 1992 and planted in 1993.
Idaho Conservation League, Brad Smith	The Decision Memo should describe whether or not the Forest Service anticipates additional future entries to tend these stands.	Future entries into stands proposed for thinning in this project have not been determined. Any future entries would go through the NEPA process if, and when, proposed.
	Consider decreasing residual stand densities compared to what is proposed to alleviate or reduce the need for future entries. A heavier treatment might lessen the longer-term environmental impacts, particularly to wildlife security.	Thank you for your comments.
	The spacing of the residual trees should vary, to avoid the appearance of plantation forestry. A greater diversity of structural conditions will benefit wildlife and be more visually appealing.	Spacing of the trees remaining after thinning would be defined by site conditions and the quality of the trees within each stand.
	Where units have "hard" or definitive edges compared to the surrounding forest, the Forest Service should consider thinning and feathering the edges at these interfaces, such that the perceived edge effect is reduced.	Thank you for your comments.

Commenter	Comment	Disposition
Idaho Conservation League, Brad Smith	In riparian areas and draws, the Forest Service should also consider retaining any cedar, hemlock, or Pacific yew where these species tend to be longer-lived.	Where appropriate, cedar, hemlock and Pacific yew would be retained to provide species diversity within stands proposed for thinning.
	Retain any hardwood tree species that have become established. The distribution of hardwoods is limited in the Nez Perce-Clearwater National Forests.	Hardwood tree species would not be thinned.
	The Decision Memo must describe whether or not the riparian management objective of INFISH and PACFISH will be satisfied when the project is complete.	Consistency with the standards and guidelines of PACFISH and INFISH will be discussed in the Decision.
Lewis-Clark ATV Club Inc. Bernie Herman	The Lewis-Clark ATV club supports the Pre-commercial Thinning Projects.	Thank you for your comment.
	Lochsa-Powell Ranger District We would like to be notified of dates thinning will occur on the borders of OHV trails 708 (map 6), 107 (map 7), 5050 (maps 8 & 9), and 58 (map 10) so we can notify OHV users to avoid the trails.	The ATV Club will be notified by the districts prior to the date(s) when thinning would occur adjacent to the OHV trail(s) identified.
	North Fork Ranger District We would like to be notified of dates thinning will occur on the borders of OHV trails 610 (map 1) and 88 (map 8) so we can notify OHV users to avoid the trails.	
	Palouse Ranger District We would like to be notified of dates thinning will occur on the border of OHV trail 19 (map 4) so we can notify OHV users to avoid the trail.	
	 We would also like the OHV trails affected put back to their original state after thinning is finished.	The OHV trails would not be affected since all work would be done by hand using chainsaws, mechanical harvesting equipment would not be used, motorized equipment (e.g. ATVs) would not be permitted off designated roads in the treatment areas, and all trees that fell across a trail would be removed.

Forest Service Response

Response 1: Some of the units proposed in the Pre-Commercial Thinning— Moose Creek project (PCT-MC) were under a multiyear 2013 pre-commercial thinning (PCT) contract, which included the area of the Johnson Bar Salvage project (JBar). Because the contracted PCT work was terminated due to the 2014 Johnson Bar Fire, not all of the contracted PCT work had been accomplished. To complete the work identified in the 2013 contract, a new PCT project was developed. The units proposed for treatment in the PCT – MC project include the uncompleted stands in the JBar area from the 2013 PCT contract.

The PCT – MC units, in question, were considered in the JBar project's cumulative effects analysis (see analysis and Table below). The analysis can be found on page 46 and the Table on pages 74 – 75 in the Johnson Bar Salvage Project's Silviculturist Specialist Report.

Cumulative Pre-commercial Thinning Effects

Pre-commercial thinning allows managers to control tree stocking and tree composition by reducing the number of trees per acre. The thinning treatment allows the most vigorously growing trees to be released from trees that are growing slowly, poorly formed or damaged. Trees released by thinning increase in foliage and photosynthesis. Pre-commercial thinning increases light, water and growing space for leave trees, which increases tree growth (Tappeiner, et. al., 2007).

Pre-commercial thinning has a temporary increase in fuels, which is eliminated when the fuels decompose in 5-10 years. The decomposition of the fuels cycles nutrients and provides nutrients for the trees to grow. Acres pre-commercially thinned in the project area is seven percent of the shade tolerant species and two percent of the shade intolerant species.

PCT–MC units in Johnson Bar Salvage Project Silviculturist Specialist Report cumulative effects analysis

Project Name	Location	Miles/Acres	Year(s)
Pre-commercial Thinning	011707A020200053000	31 acres	2013
Pre-commercial Thinning	011707A130100004000	26 acres	2013
Pre-commercial Thinning	011707A130100006000	20 acres	2013
Pre-commercial Thinning	011707A130100008000	15 acres	2013
Pre-commercial Thinning	011707A140100126000	6 acres	2009
Pre-commercial Thinning	011707A140300002000	14 acres	2013
Pre-commercial Thinning	011707A140300010000	10 acres	2013
Pre-commercial Thinning	011707A140300018000	30 acres	2013
Pre-commercial Thinning	011707A140400037000	23 acres	2013